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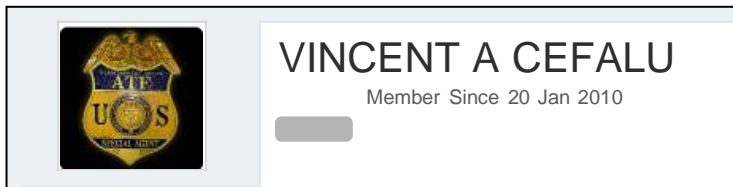
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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

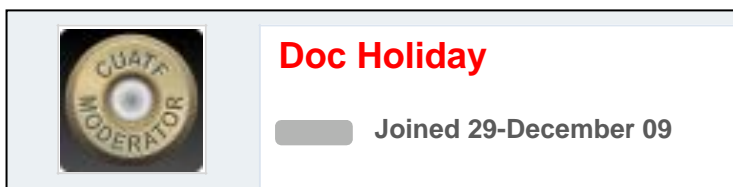
VINCENT A. CEFALU,)	CASE NO. 12-00303-TEH
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER
v.)	
)	
ERIC H. HOLDER, JR., U.S. Attorney)	
General, U.S. Department of Justice,)	
)	
Defendant,)	


THE PARTIES THROUGH THEIR ATTORNEYS OF RECORD STIPULATE AS FOLLOWS:

1. On November 26, 2012, the Court issued an order (ECF 49) regarding defendant's motion to compel plaintiff's web-based writings about his employment that directed the parties to meet and confer on the best method for providing identification and authentication of plaintiff's web-based writings.
2. After meeting and conferring as directed by the Court, the parties agree that plaintiff wrote on the website known as www.cleanupatf.org, using three identifiers: (1) Vincent A Cefalu, (2) Doc Holiday, and (3) Iceman.
3. Writings on www.cleauupatf.org by "Vincent A Cefalu" appear with the words "Vincent A Cefalu" and next to the avatar of a badge copied below:



4. Writings on www.cleanupatf.org by "Doc Holiday" appear with the words "Doc Holiday" and next to the avatar copied below:





Iceman

Joined 19-October 10

7. Upon a request made with reasonable notice, plaintiff will provide the electronic version of his writings on www.cleanupatf.org to counsel for the defendant, to the extent the writing is not publicly available on the site. Plaintiff shall undertake reasonable steps to locate said writing.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

/s/ Zahra Karinshak/
Attorneys for Plaintiff

/s/ Jonathan U. Lee/
Attorneys for Defendant

DATED: January 11, 2013

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